

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK**

MATTHEW VANDERSLOOT, individually  
and on behalf of all others similarly situated,

Plaintiffs,

v.

CHARLES BARATTA LLC, D/B/A PRIME  
MARKETING.

Defendants.

Civil Action No. 2:24-cv-07096-JMW

**NOTICE OF MOTION TO ADMIT  
COUNSEL PRO HAC VICE**

TO: Andrew Roman Perrong, Esq.  
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*Attorney for Plaintiffs*

PLEASE TAKE NOTICE that upon the annexed affidavit of movant in support of this motion and the Certificate of Good Standing annexed thereto, I, Laura E. Kogan, move this Court pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for the Eastern District of New York for an order allowing the admission of movant, a member of the firm of Benesch, Friedlander, Coplan & Aronoff LLP and a member in good standing of the bar of the State of Ohio, as attorney *pro hac vice* to argue or try this case in whole or in part as counsel for Defendant Charles Baratta LLC d/b/a Prime Marketing. There are no pending disciplinary proceedings against me in any state or federal court.

Dated: November 22, 2024

Respectfully submitted,

/s/ Laura E. Kogan

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